

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

CURTIS WRIGHT, #206-095

\*

Plaintiff,

\*

v.

\*

Civil No. MJG-02-3843

THOMAS CORCORAN, ET AL.,

\*

Defendants.

\*

\* \* \* \* \*

**MOTION FOR EXTENSION OF TIME**

Defendant, Thomas Corcoran, by his attorneys, J. Joseph Curran, Jr., Attorney General of Maryland, and Stephanie Lane-Weber, Assistant Attorney General, moves, pursuant to Fed.R.Civ.P. 6(b)(1), for an extension of time to and including July 29, 2005, to file a response to the complaint filed in the above-captioned case for the following reasons:

1. Pursuant to the Standing Order set out in *In Re State Prisoner Litigation*, Misc. No. 00-308, Defendant's response is presently due on June 29, 2005.

2. Although certain information and materials relating to the complaint herein have now been received by undersigned counsel, it is necessary that additional documents be obtained so that the Defendant can prepare and file a detailed response.

3. An additional thirty day period to and including July 29, 2005 within

which to respond to the Complaint should be sufficient to prepare Defendant's initial pleadings.

4. This Motion is not made for purposes of delay.

WHEREFORE, it is respectfully requested that this Court grant leave for Defendant former Warden Thomas Corcoran, to file a response in the instant case on or before July 29, 2005.

Respectfully submitted,

J. JOSEPH CURRAN, JR.  
Attorney General of Maryland

/s/  
STEPHANIE LANE-WEBER  
Assistant Attorney General  
General Bar No. 00023

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Baltimore, Maryland 21202  
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Attorneys for Defendant

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30th day of June, 2005, a copy of the foregoing Motion for Extension of Time was mailed, postage prepaid, to:

Curtis Wright, #206-095  
Maryland Correctional Adjustment Center  
401 East Madison Street

Baltimore, Maryland 21202

/s/

STEPHANIE LAN E-WEBER  
Assistant Attorney General